

The Honorable Paula L. McCandlis

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN BRALENS,

Defendant.

NO. MJ22-188

COMPLAINT FOR VIOLATION(S)  
18 U.S.C. § 2252(a)(4)(B), (b)(2)

BEFORE, the Honorable Paula L. McCandlis, United States Magistrate Judge,  
Bellingham, Washington.

**COUNT 1**  
**(Possession of Child Pornography)**

Beginning on a date unknown but continuing until on or about August 21, 2019, in Skagit County, within the Western District of Washington, and elsewhere, JOHN BRALENS knowingly possessed matter that contained visual depictions, the production of which involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct, that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by

1 computer, and the depictions of child pornography involved include images of a  
2 prepubescent minor and a minor who had not attained 12 years of age.

3 All in violation of Title 18, United State Code, Section 2252(a)(4)(B), (b)(2).

4 And the complainant states that this Complaint is based on the following  
5 information:

6 I, Special Agent Jesse Miller, being duly sworn under oath, depose and say:

7 **INTRODUCTION**

8 1. I am a Special Agent with the U.S. Department of Homeland Security,  
9 Homeland Security Investigations (HSI), assigned to the Assistant Special Agent in  
10 Charge (ASAC) Blaine, Washington, field office. I have been employed as an HSI  
11 Special Agent since 2001. In my capacity as a Special Agent, I am responsible for  
12 conducting investigations into the numerous federal laws enforced by HSI. Since 2018, I  
13 have investigated criminal violations relating to child exploitation and child pornography,  
14 including violations pertaining to the unlawful production, importation, distribution,  
15 receipt, attempted receipt, and possession of child pornography and material involving  
16 the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252(a), and  
17 2252A(a). I am a graduate of the Federal Law Enforcement Training Center (FLETC),  
18 HSI (formally known as the U.S. Customs Service) Special Agent Training Program and  
19 have received further specialized training in investigating child pornography and child  
20 exploitation crimes. My training included courses in law enforcement techniques, federal  
21 criminal statutes, conducting criminal investigations, and the execution of search  
22 warrants. I have participated in the execution of many search warrants which involved  
23 child exploitation and/or child pornography offenses and the search and seizure of  
24 computers and other digital devices. I am a member of the Internet Crimes Against  
25 Children (ICAC) Task Force in the Western District of Washington, and work with other  
26 federal, state, and local law enforcement personnel in the investigation and prosecution of  
27 crimes involving the sexual exploitation of children. In April of 2018, I completed a  
28 ICAC sponsored training in the BitTorrent (P2P) file sharing program.

2. The facts set forth in this Complaint are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. I have not set forth each and every fact known to me as a result of this investigation but only those facts I believe necessary to establish probable cause to conclude that JOHN BRALENS committed the offense(s) charged in this Complaint.

3. As further detailed below, based on my investigation and the investigation of other law enforcement officers, I submit there is probable cause to believe that BRALENS knowingly possessed child pornography.

4. This Complaint is being presented electronically pursuant to Local Criminal Rule CrR 41(d)(3).

#### **SUMMARY OF THE INVESTIGATION**

5. From 2018 to 2019, I identified a user of a P2P filesharing network who was sharing child sexual exploitation imagery based on that user's IP address and tracked that IP address to a home in Skagit County.

6. On August 21, 2019, I went to that home and met JOHN BRALENS, a resident of this home. After explaining the reason for my investigation, I asked BRALENS if he would submit to an interview. I advised him of his *Miranda* rights, and he provided the following information after acknowledging he understood his rights:

- He used P2P filesharing software to obtain child sexual abuse imagery from the internet during January and February of 2019. In addition to P2P filesharing software, BRALENS told agents that he had also downloaded child sexual abuse imagery from the "Darkweb."

- He downloaded this material to his HP desktop and said that agents would find child sexual abuse imagery on that computer and on an external drive connected to that computer.
- Regarding imagery depicting the abuse of babies, BRALENS said, “I see it all.” Asked if that type of imagery would be found on his computer, he responded, “There is so much I can’t delete it all. I can, but it takes so much time.”

7. I seized two digital devices that BRALENS identified as his, including his HP desktop computer. Forensic examination of the hard drive from that desktop computer showed evidence of the use of P2P filesharing software. That hard drive, along with an external drive connected to the desktop, also contained several thousand files depicting child sexual abuse. Among these were files depicting the rape and abuse of babies and toddlers.

8. I describe three of these video files below, each of which was found on a Toshiba 2TB hard drive that bears a label indicating it was manufactured outside the United States.

**File 1:** This video is 8 minutes and 52 seconds long and depicts a nude prepubescent female with an adult male’s erect penis in her mouth. The adult male also places his mouth on the young girl’s vagina. The video ends with the male placing his erect penis in the girl’s vagina. I estimate the young girl is between seven and nine years old based on her youthful appearance, small stature, and lack of pubic hair/development.

**File 2:** This video is 1 minute and 48 seconds long and depicts a toddler performing oral sex on an adult male. I estimate the young girl is between one and two years old based on her youthful appearance and small stature.

**File 3:** This video is 21 seconds long and depicts a nude toddler female lying face down on a bed. An adult male is penetrating the toddler with his erect penis, though it is unclear whether he is penetrating the child’s anus or vagina because of the camera angle. I estimate the young girl is between one and two years old

1 based on her small stature, lack of body/muscular development, and lack of  
2 pubic/body hair.

3 **CONCLUSION**

4 9. Based on the above facts, I respectfully submit that there is probable cause  
5 to believe that JOHN BRALENS did knowingly and unlawfully possess child  
6 pornography in violation of Title 18, United States Code, Section 2252(a)(4)(B), (b)(2).  
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9 **JESSE D MILLER** Digitally signed by JESSE D  
MILLER  
Date: 2022.04.27 13:27:36 -07'00'  
10 **JESSE MILLER**  
11 Special Agent, HSI

12 The above-name agent provided a sworn statement attesting to the truth of the  
13 foregoing to me this 29th day of April 2022.  
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17 **PAULA L. MCCANDLIS**  
18 United States Magistrate Judge  
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